



**CARSTENS & CAHOON, LLP**  
Attorneys and Counselors

David W. Carstens

Telephone: 972.367.2001

Facsimile: 972.367.2002

E-Mail: carstens@cclaw.com

13760 Noel Road  
Suite 900  
Dallas, Texas 75240

**MAILING ADDRESS:**  
Post Office Box 802334  
Dallas, Texas 75380

September 21, 2021

**VIA ECF**

The Hon. Analisa Torres  
District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Shack Enterprises, Inc. v. Aristotle Hatzigeorgiou*  
Civil Action 1:21-cv-05448

Dear Judge Torres:

We represent Plaintiff Shack Enterprises, Inc. in connection with the above civil action. We write as a courtesy to Defendant Aristotle Hatzigeorgiou, who has not yet had counsel appear on his behalf in the case, and pursuant to Section I(C) of Your Honor's Individual Rules, to respectfully request an extension of his time to plead or otherwise respond to the Complaint by two weeks.

The current deadline for Defendant to plead or otherwise respond to the complaint is September 21, 2021. This is the first request for such relief and Plaintiff consents thereto. Granting this request will have no effect on any other deadlines in this case as no other deadlines have yet been set. The primary reason for the request is that the two parties are actively exploring settlement and have agreed to this brief extension of time to facilitate such discussions.

Wherefore, we respectfully request that the Court permit Defendant until October 5, 2021 to plead or otherwise respond to the Complaint.

Very truly yours,

David W. Carstens

DWC/js